



R A L E I G H - D U R H A M A I R P O R T A U T H O R I T Y

1000 Trade Drive • P O Box 80001 • RDU Airport, NC 27623

John C. Brantley, Airport Director

tel: (919) 840-2100 • fax: (919) 840-0175 • www.rdu.com

February 27, 2004

Docket Management Facility
United States Department of Transportation
400 Seventh Street, SW
Nassif Building, Room PL-401
Washington, DC 20590-0001

Subject: Stage 4 Aircraft Noise Standards
Docket Number FAA-2003-16526

To Whom It May Concern:

Given that the International Civil Aviation Organization has adopted Annex 16 Chapter 4 noise standards, and knowing that certain subsonic jet airplanes have met these standards for upwards of twenty years and that some of these subsonic jet airplanes are no longer being produced, the Raleigh-Durham Airport Authority (Airport Authority) respectfully submits the following comments on the Stage 4 Aircraft Noise Standards Proposed Rule.

The Federal Aviation Administration (FAA) proposed a Stage 4 noise standard that would apply to new type designs for which application is made on or after January 1, 2006. The Airport Authority recommends that the proposed noise standard also apply to all subsonic jet airplanes and subsonic transport category large airplanes produced after January 1, 2006, even if the type design was approved prior to January 1, 2006. On December 23, 1973, the Federal Aviation Administration amended Part 36 by applying Stage 2 standards to all newly produced airplanes even though certain airplane types had been certificated prior to that date. Failure by the FAA to take such action after Part 36 was amended in 1977 to include Stage 3 standards enabled airplane manufacturers to continue producing Stage 2 airplanes through most of the 1980s concurrent with Stage 3 aircraft production. Stage 2 airplanes built in the 1980s generate a significant portion of today's noise exposure even though they now generate Stage 3 noise. Airplane manufacturers will apply appropriate noise reduction technologies to production airplanes that do not comply with Stage 4 noise standards only if required to do so by regulation. The Airport Authority urges the FAA to make that requirement a part of its final rule.

The FAA states that it has no current plan to begin a phaseout of Stage 3 airplanes. The Airport Authority understands that the FAA will neither develop nor implement any plan to phase out Stage 3 airplanes unless mandated by Congress to do so. However the Airport Authority would like to take this opportunity to state its belief that a Stage 3 phaseout is necessary to reduce noise impact on communities surrounding airports in the United States. The Airport Authority suggests a phaseout of Stage 2 jets less than or equal to 75,000 pounds by January 1, 2009, a phaseout of Stage 3 jets greater than 75,000 pounds by January 1, 2015, and a phaseout of Stage 3 jets less than or equal to 75,000 pounds by January 1, 2023.

The Airport Authority agrees with the FAA interpretation of the ICAO Chapter 4 requirements of Annex 16. The FAA should understand that the cumulative noise certification method, which permits a total cumulative reduction of 10 decibels below Stage 3 at the three measurement points, allows for certification of airplanes that reduce departure and/or sideline noise by only one decibel each below Stage 3 standards if arrival noise can be reduced by at least eight decibels. The communities will not likely perceive noise reduction on departure for any such airplanes certificated in this way.

Finally, the Airport Authority recommends that the FAA add a requirement in the Stage 4 Aircraft Noise Standards final rule that any person submitting an application for a new airplane type design or recertificated airplane type design must submit all data necessary to the FAA Office of Environment and Energy to permit development of Integrated Noise Model data for that airplane. To this day neither the FAA nor airports can model some Stage 3 airplane noise with the Integrated Noise Model since the FAA regulations do not require that such data be submitted to the FAA.

On behalf of the Raleigh-Durham Airport Authority,

Armando Tovar
Noise Officer